

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 0:16-CV-61511-WJZ**

CAROL WILDING, et al.,

Plaintiffs,

v.

DNC SERVICES CORP., d/b/a  
DEMOCRATIC NATIONAL COMMITTEE,  
et al.,

Defendants.

---

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR ORDER OF  
PROTECTION AND REQUEST FOR HEARING**

---

Defendants respectfully submit this filing in response to Plaintiffs' Motion for Order of Protection and Request for Hearing. (ECF No. 57). Defendants take no position on whether the Court should grant Plaintiffs' motion. To the extent that Plaintiffs seek to imply that the Defendants had some role in any of the incidents listed in their motion or had any other inappropriate contact with or harassment of anyone in any way involved with this case, Defendants wish to make it clear that such an implication is patently false.

Defendants oppose Plaintiffs' request for a hearing given the lack of opposition. If the Court grants Plaintiffs' request for a hearing, Defendants respectfully request that defense counsel be permitted to appear telephonically.

Dated: June 14, 2017

Respectfully submitted,

s/ Gregg D. Thomas

Gregg D. Thomas  
Florida Bar No.: 223913  
601 South Boulevard P.O. Box 2602 (33601)  
Tampa, FL 33606  
Telephone: (813) 984-3060  
Facsimile: (813) 984-3070  
gthomas@tlolawfirm.com

*s/ Elisabeth C. Frost*

---

Marc E. Elias (admitted *pro hac vice*)  
Bruce V. Spiva (admitted *pro hac vice*)  
Graham Wilson (admitted *pro hac vice*)  
Elisabeth C. Frost (admitted *pro hac vice*)  
Ruthzee Louijeune (admitted *pro hac vice*)  
PERKINS COIE LLP  
700 13th Street, N.W. , Suite 600  
Washington, D.C. 20005  
Telephone: (202) 654-6200  
Facsimile: (202) 654-9959  
[melias@perkinscoie.com](mailto:melias@perkinscoie.com)  
[bspiva@perkinscoie.com](mailto:bspiva@perkinscoie.com)  
[gwilson@perkinscoie.com](mailto:gwilson@perkinscoie.com)  
[efrost@perkinscoie.com](mailto:efrost@perkinscoie.com)  
[rlouijeune@perkinscoie.com](mailto:rlouijeune@perkinscoie.com)

*Attorneys for Defendants*

---

**CERTIFICATE OF SERVICE**

---

I HEREBY CERTIFY that a true and correct copy of the foregoing Reply to Plaintiffs' Motion for Order of Protection and Request for Hearing was served by CM/ECF on June 14, 2017 on all counsel or parties of record on the service list.

s/ Gregg D. Thomas

Attorney

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 0:16-CV-61511-WJZ**

CAROL WILDING, et al.,

Plaintiffs,

v.

DNC SERVICES CORP., d/b/a  
DEMOCRATIC NATIONAL COMMITTEE,  
et al.,

Defendants.

---

**SERVICE LIST**

---

Jared H. Beck  
Elizabeth Lee Beck  
Email: jared@beckandlee.com  
Email: elizabeth@beckandlee.com  
BECK & LEE TRIAL LAWYERS  
12485 SW 137th Ave., Suite 205  
Miami, FL 33186  
Tel: 305-234-2060  
Fax: 786-664-3334

Antonio Gabriel Hernandez  
Email: hern8491@bellsouth.net  
ANTONIO G. HERNANDEZ P.A.  
4 SouthEast 1st Street, 2nd Floor  
Miami, FL 33131  
Tel: 305-282-3698  
Fax: 786-513-7748

Cullin Avram O'Brien  
Email: cullin@cullinobrienlaw.com  
CULLIN O'BRIEN LAW, P.A.  
6541 NE 21st Way  
Ft. Lauderdale, FL 33308  
Tel: 561-676-6370  
Fax: 561-320-0285